

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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THOMAS V. GOULD  
CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE

Kenneth K. Wooten

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. \_\_\_\_\_

Builders Transportation Company

(Name of defendant or defendants)

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Kenneth K. Wooten  
(name of plaintiff)

is a citizen of the United States and resides at 5913 Belle Pointe  
(street address)

Southaven  
(city)

U.S  
(country)

MS  
(state)

38672  
(zip code)

662-654-1787x  
(telephone number)

3. Defendant Builders Transportation

(defendant's name)  
lives at, or its business is located at 3710 Tulane Memphis, TN 38116  
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at

3710 Tulane M  
(street address)  
Memphis U.S TN 38116  
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 22 10 2012

(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about \_\_\_\_\_

(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 23 5 2013

(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 15 11 2014. (Attach a copy of the notice to this complaint.)  
(day) (month) (year)

9. Because of plaintiff's (1) \_\_\_ race, (2) ☒ color, (3) \_\_\_ sex, (4) \_\_\_ religion, (5) \_\_\_ national origin, defendant

(a) \_\_\_ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment.

(c) \_\_\_ failed to promote plaintiff.

(d) \_\_\_\_\_

10. The circumstances under which defendant discriminated against plaintiff were as follows:

Was terminated and written up for no reason.  
Charged that I had preventable accident which the  
proof of the ticket documented. While drivers have  
had several accidents and that were not terminated.  
They falsely reported this to D. A.C.

11. The acts set forth in paragraph 9 of this complaint

- (a) \_\_\_\_ are still being committed by defendant.  
(b) \_\_\_\_ are no longer being committed by defendant.  
(c) ☒ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) \_\_\_\_ Defendant be directed to employ plaintiff, or  
(b) \_\_\_\_ Defendant be directed to re-employ plaintiff, or  
(c) \_\_\_\_ Defendant be directed to promote plaintiff, or;  
(d) ☒ Defendant be directed to Compensate for hardship  
that was put forth by plaintiff.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ( ) No ☒

Kenneth K. Wood  
SIGNATURE OF PLAINTIFF